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*Counsel to the Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

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Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF MEDIATION  
CONFIDENTIALITY PROTOCOL**

Date: May 27, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: **Telephonic Appearances Only**  
United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1           **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**  
2 **COURT JUDGE, THE DEBTORS AND THEIR COUNSEL, AND ALL PARTIES IN**  
3 **INTEREST:**

4           **PLEASE TAKE NOTICE** that on April 22, 2020, Judge Randall J. Newsome (Ret.),  
5 court-appointed mediator signed a Mediation Confidentiality Protocol (the “**Protocol**”), attached  
6 hereto as Exhibit A, establishing confidentiality requirements for mediation-related documents.

7           **PLEASE TAKE FURTHER NOTICE** that, in connection with efforts to resolve the  
8 outstanding objections to plan confirmation filed by the Official Committee of Tort Claimants  
9 (the “**TCC**”), the TCC anticipates filing a stipulation, statement, or other document that will  
10 confirm the resolution or other status of such objections, some of which have been the subject of  
11 mediation proceedings that are covered by the Protocol. The TCC will ensure that any such filing  
12 will conform to the requirements of the Protocol.

13  
14 Dated: May 31, 2020

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16 BAKER & HOSTETLER LLP

17 By: /s/David J. Richardson  
18 Robert A. Julian  
19 Elizabeth A. Green  
20 David J. Richardson

21 *Counsel to the Official Committee of Tort*  
22 *Claimants*  
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**EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

**Bankruptcy Case  
No. 19-30088 (DM)**

**Chapter 11**

**MEDIATION  
CONFIDENTIALITY  
PROTOCOL**

The Mediation shall include discussions among the Debtors (including their attorneys and financial advisors), the TCC (including its attorneys, financial advisors, and members), the Shareholder Proponents (including their attorneys and financial advisors) and the Consenting Fire Claimant Professionals (collectively, the “Mediation Parties”) regarding the negotiation and finalization of certain documents relating to the implementation of the Plan. Any document transmitted by a Mediation Party that copies the undersigned Mediator shall be subject to this Protocol (the “Mediation Documents”), regardless of whether such Mediation Document contains any special legend or notation identifying it as a Mediation Document.

No Mediation Party may disclose any Mediation Document prepared or distributed by any other Mediation Party (an “Other Party Mediation Document”) or any communication regarding an Other Party Mediation Document or refer to, characterize, or describe any Other Party Mediation Document or communication regarding any Other Party Mediation Document or its contents to any person, other than another Mediation Party. Without limiting the foregoing and for the avoidance of doubt, no Mediation Party shall file any Other Party Mediation Document with the Bankruptcy Court or any other court, including under seal, or refer to,

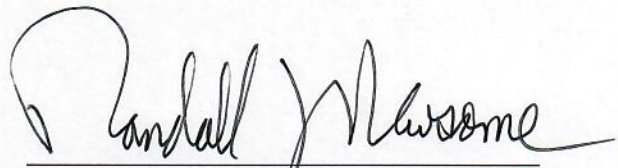


characterize, or describe any Other Party Mediation Document or communication regarding any Other Party Mediation Document or its contents in any pleading or filing (whether or not under seal) in any proceeding, including without limitation, any court, regulatory agency, or administrative proceeding.

If any Mediation Documents are filed with the Bankruptcy Court by the Mediation Party that prepared such documents, then any Mediation Party may file pleadings and comments regarding such filed Mediation Documents provided that no information obtained in the Mediation is used in such pleadings or comments.

Any violation of this Protocol by a Mediation Party, its attorneys, financial advisors, or members, shall subject such person to sanctions by the Bankruptcy Court. Each Mediation Party shall provide any individual that receives a Mediation Document with a copy of this Protocol.

Dated April 22, 2020



Hon. Randall J. Newsome (Ret.)  
Court Appointed Mediator